

## RATIONALE

# **STATE OF TENNESSEE NPDES GENERAL PERMIT for DISCHARGES of STORM WATER ASSOCIATED with CONSTRUCTION ACTIVITIES**

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## **1 Introduction**

This permit rationale (or fact sheet) sets forth the Division of Water Pollution Control's (the division's) basis for permit conditions to be applied statewide for the reissuance of the Tennessee NPDES General Permit for Discharges of Storm Water Associated with Construction Activities (CGP). The CGP is intended to authorize storm water point source discharges to waters of the State of Tennessee from construction activities that result in the disturbance of one acre or more of total land area.

## **2 Background**

On November 16, 1990, the EPA issued an NPDES rule (Phase I) that required a wide range of industrial activities to obtain permits to discharge storm water runoff. Category ten (x) from the extensive definition of "storm water discharges associated with industrial activity," (promulgated by the EPA in 40 CFR §122.26(b)(14)) includes construction activity, identified as following:

*"construction activity including clearing, grading and excavation activities except operations that result in the disturbance of less than five acres of total land area and which are not a part of a larger common plan of development or sale"*

In December 1999, EPA finalized the "Phase II" regulations, which require controls on storm water discharges from a broader sector of municipalities, industries, and construction sites. On March 10, 2003,

Phase II regulations came into effect, and extended coverage to construction activities (including other land-disturbing activities) that disturb one to five acres in size, including even smaller sites (<1 acre) that are part of a larger common plan of development or sale.

Because permit requirements for the above described construction activities are similar across the state, and because of the number of facilities now in existence and expected to be created in the future, it has been the division's position that this category of sources would be controlled appropriately under an NPDES general permit<sup>1</sup>. Initially, the State of Tennessee promulgated a general permit rule applicable to such construction activities. This general permit by rule became effective on September 26, 1992. The present general NPDES permit was renewed on June 27, 2000, and expires on May 31, 2005.

For the purpose of this proposed general permit, the term "storm water discharges associated with construction activity" means a discharge from any conveyance which is used for collecting and conveying storm water from construction activities including clearing, grading, filling and excavating (including borrow pits), or other similar construction activities that result in the disturbance of one acre or more of total land area.

### **3 Construction Activity and Potential Impacts on Water Quality**

Disturbed soil, if not managed properly, can be washed off-site during storms. Unless proper erosion prevention and sediment controls are used for construction activities, silt transport to local surface water is likely. Excessive silt in waterways causes adverse impacts due to biological alterations, reduced passage in rivers and streams, higher drinking water treatment costs for removing the sediment, and the alteration of water's physical/chemical properties, resulting in degradation of its quality. This degradation process is known as "siltation".

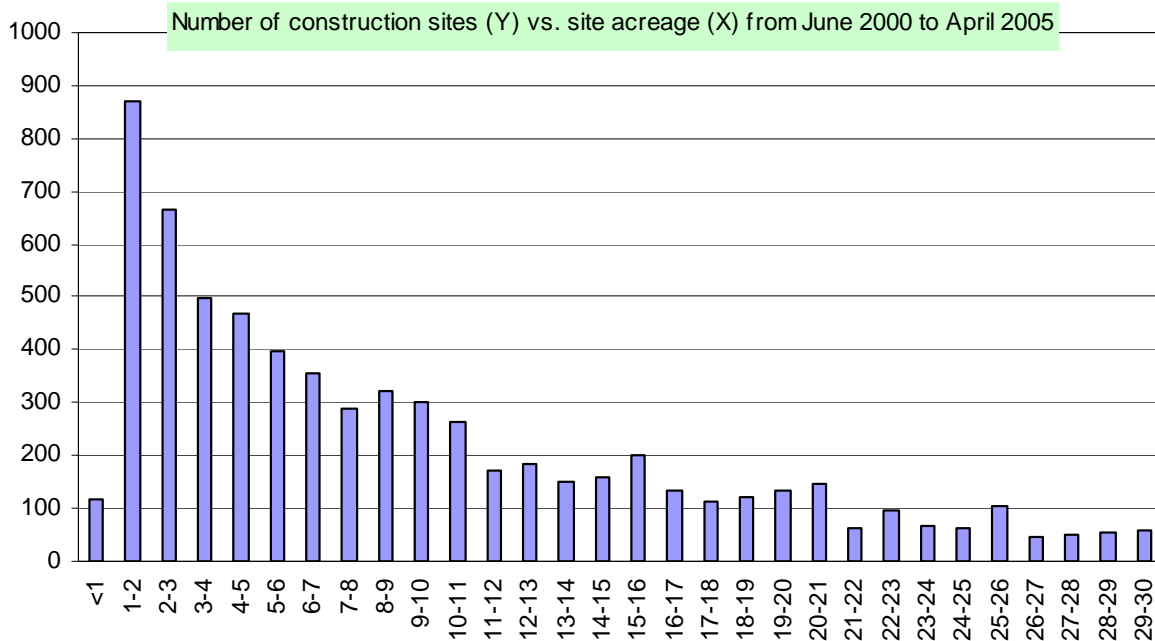
Siltation is a major problem with Tennessee surface waters. TDEC has determined that 27.2% of its assessed rivers and streams are polluted due to siltation. Since one millimeter of soil over one acre site can weigh 5 tons, even a minor uncontrolled construction activity can cause major impairment in surface waters. Soil losses from pastureland averages 1.5 tons/acre-year, cropland cultivation can lose 20 tons/acre-year, whereas major construction activities can result in 150 to 200 tons/acre-year in the stormwater runoff.

Since 1992, the division has permitted over 10,000 construction sites by way of general permit. During the current general permit term (June 2000 through April 2005), 8,667 projects across the state were identified as requiring construction permit coverage. A total of 161,250 acres (or approximately 0.6 % of the State of Tennessee area) were reported disturbed by construction activity in the same time period. The average size of construction site was 19.7 acres, with a median value of 8 acres. A distribution diagram showing number of construction sites of various sizes is presented below.

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<sup>1</sup> TDEC Rules, Chapter [1200-04-05-.02](#), - *Definitions*, states in paragraph (64): "Permit means an authorization, license, or equivalent control document issued by the Division of Water Pollution Control which implements the requirements of the TWQCA. "Permit" includes an NPDES "general permit."

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The division compiled the following information by tracking construction activities during the previous construction general permit:

- construction sites were disturbed for an average of 450 days;
- streams and creeks were present on 2,744 construction sites;
- 477 projects had wetlands identified at a site;
- 314 proposed discharges were into high quality waters;
- 3,658 proposed discharges were into impaired water segments;
- presence of threatened and endangered species were identified in the vicinity of 2,391 construction sites;
- at the time this rationale was prepared, 7,247 construction sites (132,393 acres) were still covered under the general permit.

Site topography, ground cover and best management practices (BMP) are the key parameters for successful erosion control. This NPDES general permit requires that BMPs be used by the operators at construction sites. However, supplementary controls may be necessary for some specific site and construction activities to achieve effective protection of receiving stream and minimize degradation of water resources.

## 4 Present Permit Conditions

The present system protects the quality of the waters of the state exclusively through the administration of the Tennessee Department of Environment and Conservation's (TDEC) eight regional Environmental Field Offices (EFOs) and Nashville Central Office. Property owners, developers, builders, contractors and subcontractors who plan to conduct any construction must submit a Notice of Intent (NOI) and receive Notice of Coverage (NOC) from TDEC. Requesting coverage under the general permit means that an

applicant had obtained and examined a copy of the permit, and thereby acknowledges applicant's claim of ability to be in compliance with permit terms and conditions.

## **5 Proposed Changes in the New Construction General Permit**

### **5.1 References to TDEC's "Environmental Assistance Centers" were changed to "Environmental Field Offices"**

### **5.2 Electronic Submission of NOIs, NOTs and Reports**

If the division notifies dischargers of other NOI, NOT and report options that become available at a later date (e.g., electronic submission of forms or letters), the permittees may take advantage of those options to satisfy permit requirements. The notification can be made either directly, by public notice, or by making information available on the world wide web.

### **5.3 Sites covered under the current CGP would get automatic coverage under the proposed permit. These permittees were given 180 days to revise and implement a Storm Water Pollution Prevention Plan**

The division considered requesting re-submission of a notice of intent (NOI) following the issuance of the new CGP for those sites where construction activities are still in progress at the time of the previous permit expiration date. However, the contents of the NOI were not substantially changed in the new permit. Requesting an additional copy of the NOI would impose an additional paperwork burden on the current permittees and the division. Re-submitted NOI would not provide any additional information regarding active construction sites. Therefore, division's intent is to provide continuation of permit coverage for all permittees that still operate construction sites during this transition period.

Coverage under the new permit will be confirmed by the division by transmitting an updated notice of coverage to permittees. There will be no additional fees associated with an extension of coverage for existing sites under the new permit. The division may, at its discretion, require permittees to confirm an intent to be covered under the new permit following its effective date.

Notice of termination (NOT) requirements for operators are still applicable under the new permit. Operators of an existing site presently permitted under the current construction general permit shall maintain full compliance with the current storm water pollution prevention plan (SWPPP). The current SWPPP should be modified, if necessary, to meet requirements of this permit, and the SWPPP changes implemented no later than 6 months following the new permit effective date.

### **5.4 All new sites that request coverage under the CGP must have a SWPPP submitted with the NOI**

Submitting a complete NOI, a SWPPP and an appropriate permitting fee are required to obtain coverage under this general permit. Operators wishing to obtain coverage under this permit must develop and submit a comprehensive site-specific SWPPP with the NOI. The request to submit a comprehensive SWPPP with the NOI will have a positive impact on all construction-related activities from the date construction commences to the date of termination of permit coverage. The SWPPP must be implemented prior to commencement of construction activities.

**5.5 Signatory Requirements were updated to reflect changes published in 40CFR 122.22 (July 1, 2001 Edition, page 155)**

Signatory requirements were updated to reflect changes published in 40CFR 122.22, as shown below:

1. Signatory Requirements for a Notice of Intent

Notice of Intent shall be signed as follows:

a) For a corporation. By a responsible corporate officer. For the purpose of this section, a responsible corporate officer means:

- (1) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or
- (2) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures. NOTE: EPA does not require specific assignments or delegations of authority to responsible corporate officers identified in § 122.22(a)(1)(i). The Agency will presume that these responsible corporate officers have the requisite authority to sign permit applications unless the corporation has notified the Director to the contrary. Corporate procedures governing authority to sign permit applications may provide for assignment or delegation to applicable corporate positions under § 122.22(a)(1)(ii) rather than to specific individuals.

b) For a partnership or sole proprietorship. By a general partner or the proprietor, respectively; or

c) For a municipality, State, Federal, or other public agency. By either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes: (i) The chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

2. Signatory Requirements for Reports

All reports required by the permit and other information requested by the division shall be signed as follows:

a) All reports required by permits, and other information requested by the director shall be signed by a person described in paragraph 6.7.1. (Signatory Requirements for a Notice of Intent) of this section, or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described in paragraph 6.7.1. (Signatory Requirements for a Notice of Intent) of this section;

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- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,
- (3) The written authorization is submitted to the Director.

b) Changes to authorization

If an authorization under paragraph a)(2) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph a)(2) of this section must be submitted to the Director prior to or together with any reports, information, or applications to be signed by an authorized representative.

c) Certification

Any person signing a document under paragraph a) (1) or (2) of this section shall make the following certification:

*“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”*

## **5.6 Permit Coverage through Qualifying Local Program**

In accordance with the Code of Federal Regulations, 40 CFR 122.44(s), the division is proposing to revise the new CGP by incorporating by reference municipalities with a qualifying state, tribal or local program for the general construction permit.

A qualifying local program is a municipal stormwater program for stormwater discharges associated with construction activity that has been formally approved by the division. This means that if a local government, municipality or county, has a qualifying erosion prevention and sediment control program, it may elect to administrate construction activities including collecting fees, inspecting construction sites and taking enforcement action against sites which are polluting the waters of the state within their jurisdiction. Storm water runoff from construction sites which would remain solely under the authority of TDEC are projects for Tennessee Department of Transportation (TDOT), Tennessee Valley Authority (TVA) and the local MS4 program itself.

Thus, in those areas where a local government, city or county, has a qualifying local program, the owner or the representative of the owner, developer or contractor may submit the NOI directly to the local qualifying government. The local government with qualifying local programs will authorize, inspect and administrate construction activities within their boundaries. The owner of the construction site that is administered by an authorized local program under this proposal is deemed to be covered under the division’s CGP and shall comply with the requirements of the permit. TDEC will retain authorization and

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have oversight, to ensure that the local program meets the criteria to be a qualifying program. This means the division may enforce against the owner of the construction site for violations of the permit. In areas outside “qualifying” municipalities, TDEC will continue to issue NPDES permitting as we do now.

The division will reserve the right to require any operator located within the jurisdiction of a qualifying local program to obtain permit coverage directly from the division. The operator shall be notified in writing by the division that coverage by the qualifying local program is no longer applicable.

Issue 1: What is a “qualifying state, Tribal or local erosion and sediment control program”?

A qualifying state, Tribal or local erosion and sediment control program for construction activity is defined in Code of Federal Regulations, 40 CFR 122.44(s), as follows:

- (1)
  - (i) *Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;*
  - (ii) *Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;*
  - (iii) *Requirements for construction site operators to develop and implement a storm water pollution prevention plan. (A storm water pollution prevention plan includes site descriptions, descriptions of appropriate control measures, copies of approved State, Tribal or local requirements, maintenance procedures, inspection procedures, and identification of non-storm water discharges); and*
  - (iv) *Requirements to submit a site plan for review that incorporates consideration of potential water quality impacts.*
- (2) *And any additional requirements necessary to achieve the applicable technology-based standards of “best available technology” and “best conventional technology” based on the best professional judgment of the (division’s) permit writer.*

The state proposes, in addition, that a “qualifying local program”:

- a. be a permitted Municipality Separate Storm Sewer System (MS4); and
- b. be in compliance with specific requirements, i.e. have illicit discharge and construction site runoff ordinances be in effect.

Issue 2: How does a municipality get to be a “qualifying state or tribal or local” erosion prevention and sediment program?

The municipality with MS4 coverage will have to request and receive certification from TDEC that their local program meets the requirements for a “qualifying local program.” TDEC will conduct a review of the municipality’s MS4 program including confirming the existence of the required ordinances, staffing and equipment to conduct complaint follow-ups, enforcement and site inspections. Upon satisfactory completion of the review, TDEC will issue a supplemental Notice of Coverage to the municipal specifying that the municipal is a “qualifying local program.”

Issue 3: Which municipalities have a qualifying local erosion and sediment control program?

Presently, no municipalities have a qualifying local erosion and sediment control program. However, both Phase I and Phase II MS4s will be eligible, based on this proposal, to administer storm water discharge from construction sites in their jurisdiction.

**5.7 The new permit does not authorize discharges of pollutants of concern to waters for which there is an EPA-approved total maximum daily load (TMDL) unless measures or controls that are consistent with the assumptions and requirements of such TMDL are incorporated into the SWPPP**

Documentation of permit eligibility related to Total Maximum Daily Loads (TMDLs) shall be included with the SWPPP.

**5.8 Verbal confirmation of NOI completeness does not authorize storm water discharges from construction sites**

The new permit authorizes discharges from a construction site as of the effective date and time the division prepares the NOC, informing the permittee that the NOI was received and storm water discharges from a construction activity have been approved under the new permit. Assigning a permit tracking number by the division to a proposed discharge from a construction site does not confirm or imply an authorization to discharge under the new permit. The division expects to issue the NOC within 30 days from receipt of a complete application.

**5.9 Permit tracking numbers**

Previously assigned tracking numbers will be retained at existing sites, presently permitted under the construction general permit. An operator at the new construction site will be assigned a new permit tracking number. Change of ownership and operational control of an entire site does not require for a new tracking number to be assigned. However, change of ownership and operational control of a portion of a site does require a new tracking number. If a new operator is a new contractor (secondary permittee) added to an existing permitted construction site, the previously assigned tracking number will be retained.

**5.10 Roles and responsibilities of typical construction site operators are clarified in a new permit**

Typical construction site operators are: an owner/developer, a commercial builder and a contractor.

An owner/developer is considered an initial permittee. The initial permittee must submit a comprehensive SWPPP with the NOI. The comprehensive SWPPP should address all construction-related activities from the date construction commences to the date of termination of permit coverage. The initial permittee must retain permit coverage until all construction within the development is completed (including, but not limited to, infrastructure, common areas, storm water drainage structures, sediment control basin, etc.) and all disturbed soils have been finally stabilized and temporary erosion and sediment control measures have been removed.

A commercial builder with design and operational control of the portion of the site is by definition a new operator, and is therefore considered a primary permittee. A primary permittee is required to obtain coverage under the permit, and will be assigned a new tracking number. New operators with design and operational control of their portion the construction site are not precluded from developing and



implementing their own SWPPP, but are instead encouraged to adopt, modify, update and implement a comprehensive SWPPP prepared by the initial permittee.

A contractor is typically hired by the initial or by the primary permittee. A contractor is considered a secondary permittee. A commercial builder that was hired by an initial permittee is also considered a contractor, and is therefore a secondary permittee. A secondary permittee is required to apply for permit coverage on the same NOI form as the initial permittee or the primary permittee that hired them. However, the secondary permittee will not be assigned a tracking number.

**5.11 The division's Nashville Central Office will serve as a processing office for NOIs submitted for projects of the Tennessee Department of Transportation (TDOT) and the Tennessee Valley Authority (TVA)**

**5.12 Certification by a registered engineer or landscape architect**

The new permit requires for the registered engineer or landscape architect to prepare and certify the SWPPP for construction activities that result in the disturbance of more than 5 acres of total land area. Based on our experience, many SWPPPs submitted for division's review were already prepared by certified engineers. Therefore, this requirement will not present as a significant financial or paperwork burden on applicants. At the same time, such certification will provide assurance that good engineering practices and appropriate BMPs were used in preparing a SWPPP. Construction sites larger than 5 acres were selected as such sites are considered as "large" construction sites by the U.S. EPA (see <http://www.epa.gov/fedrgstr/EPA-WATER/2002/December/Day-20/w32134.htm>, <http://www.epa.gov/owow/info/NewsNotes/issue60/national60.html>)

**5.13 In addition to using a rain gauge to document daily rainfall records at the site, permittees can use a representative reference site for a record of daily amount of precipitation**

**5.14 The criterion for requiring a sediment basin at the construction site was changed from referring to disturbed area to total drainage area in the watershed**

The previous permit, in Section IV.D.a.iii. (Structural practices), paragraph (b), page 16, states, in part:

"For common drainage locations that serve an area with 10 or more acres disturbed at one time, a temporary (or permanent) sediment basin that provides storage for a calculated volume of runoff from a 2 year, 24 hour storm and runoff coefficient from each disturbed acre drained, or equivalent control measures, shall be provided where attainable until final stabilization of the site."

The proposed permit, in subsection 3.5.3.3. (Structural practices), page 17, states, in part:

"For common drainage locations that serve a construction site located in an area with 10 or more acres in the watershed, a temporary (or permanent) sediment basin that provides storage for the runoff from a 2 year, 24 hour storm from each acre drained, or equivalent control measures, shall be provided until final stabilization of the site."

The requirement from the previous permit was not taking into consideration often significant contribution of storm water runoff from undisturbed portion(s) of the construction site, or from off-site storm water runoff. The amount and velocity of storm water discharges authorized through this general permit is

influenced by the size of a drained watershed. The proposed language recognizes that the size of a drained watershed may directly influence sediment basin size and design.

#### **5.15 Vehicle tracking of sediments at a point of entrance/exit to a construction site has been specifically addressed**

Paragraph (b) in section 3.5.5. – *Other items needing control* in the new permit states:

*“Off-site vehicle tracking of sediments and the generation of dust shall be minimized. A stabilized construction access (a point of entrance/exit to a construction site) shall be described and implemented to reduce the tracking of mud and dirt onto public roads by construction vehicles.”*

#### **5.16 Site inspector training and certification required**

The previous general permit did not specifically address requirements for site inspector training and certification. The new permit updates the previously “reserved” section by incorporating the following requirement in subsection 5.17.1.1 - *Inspector training and certification*, which states, in part:

*“Inspectors must have successfully completed the “Fundamentals of Erosion Prevention and Sediment Control” course by the Tennessee Water Resources Research Center or an equivalent course for individuals involved in land-disturbing activities which provides a working knowledge of erosion prevention and sediment controls.”*

However, in order to provide ample time for all personnel in charge of performing inspections at construction sites to comply, this requirement of the new permit goes in effect 24 months following the new permit effective date. A copy of the record of inspector certification should be kept with the SWPPP.

#### **5.17 Additional SWPPP requirements for discharges into impaired or high quality waters**

Similarly to subpart 5.14 above, criterion for requiring a sediment basin at the construction site was changed from referring to disturbed area to total drainage area in the watershed. However, for discharges into impaired or high quality waters, the requirement applies to common drainage locations that serve an area with 5 or more acres in the watershed.

Buffer zone requirements were added to discharges from new construction sites into impaired or high quality waters. The size of the buffer zone (60 feet) was based on the requirements of the TDEC Rules, Chapter [1200-4-5-.14\(d\)](#). “Buffer Zone” is defined as a permanent strip of dense undisturbed perennial native vegetation, either original or re-established, that borders streams and rivers, ponds and lakes, wetlands, and seeps. Buffer zones are established for the purposes of slowing water runoff, enhancing water infiltration, and minimizing the risk of any potential nutrients or pollutants from leaving the field and reaching surface waters. Buffer zones are most effective when storm water runoff is flowing into and through the buffer zone as shallow sheet flow, rather than in concentrated form such as in channels, gullies, or wet weather conveyances. Therefore, it is critical that the design of any development include management practices, to the maximum extent practical, that will result in storm water runoff flowing into and through the buffer zone as shallow sheet flow. The new permit states in section 4.4.2. - *Buffer zone requirements for discharges into impaired or high quality waters*, page 24:

*“Notwithstanding any valid Aquatic Resource Alteration Permits (ARAP), or equivalent permits issued by the federal authorities, or buffer zone requirements established by the*

*local MS4 program, a minimum of 60-foot natural riparian buffer zone between the stream and the disturbed construction area shall be established. The water quality buffer zone is required to protect waters of the state (e.g., perennial and intermittent streams, rivers, lakes, wetlands) located within the boundaries of the project, as identified on a 7.5-minute USGS quadrangle map, or as determined by the director. The buffer zone requirement only applies to new construction sites, as described in section 2.4.2 above. No construction activities shall take place in the buffer zone.”*

#### **5.18 Requirements for termination of permit coverage were clarified**

Similarly to the previous permit, the requirement for termination of permit coverage applies to all operators at the construction site. However, a clear distinction was made between termination of coverage for the site itself (owner/developer) and termination of coverage for operators with day-to-day operational control (contractors).

Termination of permit coverage for a construction site can be requested only by the initial permittee (typically, owner/developer), only when all construction activity at the entire site is completed and all disturbed soils have been finally stabilized and temporary erosion and sediment control measures have been removed. Therefore, even if the initial permittee had sold all commercial lots at the site, but has design or operational control over infrastructure, common areas, storm water drainage structures, sediment control basin, etc., he or she is not eligible for termination of permit coverage until all construction activities at all lots are complete and the entire site stabilized.

Persons that purchased commercial lot(s) at the development for the purpose of constructing and selling a structure are also considered “operators” at the construction site. Typically, these are commercial builders, and they must submit an NOI and obtain coverage under the general permit, becoming primary permittees for their portion of the site. Termination of permit coverage for that portion of the site can be requested only by the primary permittee that submitted the NOI.

If all requirements for termination of permit coverage are met, the division will prepare and transmit a notification that termination of coverage under the general permit was approved. This notification will be mailed to a person identified as owner/developer on the NOI. The division expects to confirm termination of permit coverage within 30 days from receipt of a complete NOT.

Termination of coverage for operators with day-to-day operational control (contractors) was also addressed and clarified in the new permit. Contractors are hired by the initial permittee or the primary permittee. Although contractors must co-sign the NOI, they are not issued a NOC. Therefore, once the NOT from a contractor was received, the division will record such information, but will not notify contractors that their permit coverage has been terminated.

## **6 Permit Issuance and Public Notice Procedures**

This general permit is drafted in accordance with applicable NPDES regulations (40 CFR 122, 123, 124, and 125), the Tennessee Water Quality Control Act (T.C.A. § 69-3-101, et.seq.), and the TDEC’s permit issuance regulations in TN Rule 1200-4-05.

The applicable regulations for issuance of this general permit are found in 40 CFR 122.28 and 123.44, and the regulations for fact sheet requirements are found in 40 CFR 124.8 and 124.56.

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The division will publish notice of its intent to issue the CGP for storm water discharges associated with construction activity and notice of one or more public hearings to receive comments on the draft permit. At least 30 days notice will be given for the public hearings. Comments will be received at least 10 ten days after the last hearing. Any interested person may request copies of the rationale (fact sheet) and draft permit and submit written comments on the draft permit.

The division will hold public hearings at the following locations:

Date	City	Location	Time
Thursday, May 5, 2005	Nashville	17 <sup>th</sup> Floor L & C Tower 401 Church Street	6:00 p.m. CDT
Monday, May 9, 2005	Cookeville	Tennessee Technological University Pennebaker Hall Room 128	6:00 p.m. CDT
Tuesday, May 10, 2005	Nashville	17 <sup>th</sup> Floor L & C Tower 401 Church Street	6:00 p.m. CDT
Wednesday, May 11, 2005	Elizabethton	Sycamore State Park 1651 W. Elk Ave.	6:00 p.m. EDT
Thursday, May 12, 2005	Knoxville	Pellissippi State Technical Community College J.L. Goins Administration Building Hollingworth Auditorium	6:00 p.m. EST
Monday, May 16, 2005	Jackson	TDOT Region 4 Auditorium 300 Benchmark Place	6:00 p.m. CDT
Tuesday, May 17, 2005	Bartlett	Bartlett City Hall 6400 Stage Road  Stage Room Singleton Community Center 7266 Third Road	1:00 p.m. CDT  6:30 p.m. CDT
Thursday, May 19, 2005	Chattanooga	State Office Building 1 <sup>st</sup> Floor Auditorium 540 McCallie Avenue	6:00 p.m. EST

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For additional information contact:

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**URL:** <http://www.state.tn.us/environment/permits/conststrm.php>

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